

# United States Senate

COMMITTEE ON FINANCE

WASHINGTON, DC 20510-6200

April 21, 2010

## **Via Electronic Transmission**

Thomas J. Betlach  
Director  
Arizona Health Care Cost Containment System  
State of Arizona  
801 East Jefferson Street  
Phoenix, AZ 85034

Dear Director Betlach:

In the United States, the federal and state governments spend roughly \$317 billion every year on the Medicaid program. As Ranking Member of the Senate Committee on Finance, I have an obligation to ensure that taxpayer dollars are appropriately spent on federal health care programs. Like the Medicare program, Medicaid suffers from systemic weaknesses that lead to fraud, waste, and abuse across the program, resulting in higher costs and less health care to those who are in need. The overutilization of prescription drugs, whether through drug abuse or outright fraud, plays a significant role in the rising cost of our healthcare system. The purpose of this letter is to request information regarding certain outliers in Arizona's Medicaid program and what steps Arizona takes to monitor rates of utilization.

In recent inquiries, I have asked the U.S. Department of Health and Human Services about physicians prescribing mental health drugs at astonishingly high rates. In addition to these concerns, a recent CNN report detailed the increasing abuse of OxyContin, Roxicodone, and Xanax. Specifically, the report described the role some pain management clinics and physicians play in the black market for these drugs. I write today to better ascertain how high rates of both mental health and pain medication utilization are affecting the Medicaid program, as well as how Arizona's rates compare to the national rates.

To that end, please provide charts that list of the top ten Medicaid prescribers of the following drugs for the years 2008 and 2009. For each prescriber, please provide his/her prescriber identifier, and the number of prescriptions written per drug per year, and the total amount billed to Medicaid per drug, separated for each year.

- Abilify;
- Geodon;
- Seroquel;
- Zyprexa;
- Risperdal;

- OxyContin;
- Roxicodone; and
- Xanax.

I thank you in advance for your cooperation and request that you provide the requested documents and written responses by no later than May 5, 2010. In your reply, please format information into a chart like the examples provided below. All formal correspondence should be sent electronically in PDF format to [Brian\\_Downey@finance-rep.senate.gov](mailto:Brian_Downey@finance-rep.senate.gov) or via facsimile to (202) 228-2131. Of course should you wish to discuss this matter further, please do not hesitate to contact Christopher Armstrong of my Committee staff at (202) 224-4515.

Sincerely,



Charles E. Grassley  
Ranking Member

Attachment

**Drug X, 2008**

Prescriber Identifier	Total prescriptions	Total billed to Medicaid
123456789	25,000	250,000
234567891	24,000	240,000
345678912	23,000	230,000
456789123	22,000	220,000
567891234	21,000	210,000
678912345	20,000	200,000
789123456	19,000	190,000
891234567	18,000	180,000
912345678	17,000	170,000
012345678	16,000	160,000

**Drug X, 2009**

Prescriber Identifier	Total prescriptions	Total billed to Medicaid
123456789	25,000	250,000
234567891	24,000	240,000
345678912	23,000	230,000
456789123	22,000	220,000
567891234	21,000	210,000
678912345	20,000	200,000
789123456	19,000	190,000
891234567	18,000	180,000
912345678	17,000	170,000
012345678	16,000	160,000

**From:** Berman, Suzanne  
**Sent:** Wednesday, May 05, 2010 5:01 PM  
**To:** 'Brian\_Downey@finance-rep.senate.gov'  
**Cc:** Betlach, Tom; Aurelius, Kate; Botsko, David - Inspector General  
**Subject:** Senator Grassley's Data Request

Dear Mr. Downey,

In response to Senator Grassley's Top Ten Prescriber report request, attached is an excel file containing 2008 and 2009 data from the Arizona Health Care Cost Containment System (AHCCCS), the single source State Medicaid Agency for Arizona.

AHCCCS operates under an 1115 waiver and capitates managed care entities to provide care for approximately 95% of the 1.3M Medicaid members with the remainder enrolled in a traditional Medicaid FFS program. AHCCCS covers acute, long term care and behavioral health services.

The behavioral health services are carved out to the Arizona Department of Health Services- Division of Behavioral Health Services and they contract with four behavioral health managed care organizations to serve the state which is divided into 5 geographic service areas.

The average monthly enrollment of members in the behavioral health system was 96,500 in 2008 and 109,000 for 2009.

Of the 96,500 monthly behavioral health enrollees, 22% are adults with serious mental illness, 31% are children and the remainder are members who are enrolled in general mental health and/or substance abuse program types. For 2009, the percentages increased slightly by the type of member, however there were more Medicaid members enrolled and receiving treatment. This model is very different from most other states and is in place by state statute.

The prescribers for each of the atypical antipsychotic drugs listed in the attachment are all psychiatric clinicians who contract with the behavioral health managed care contractors to provide psychiatric treatment services under the carve-out. The Department of Behavioral Health Services requires that providers, in this carve-out, be psychiatric clinicians- adult and child psychiatrists as well as nurse practitioners and physician assistants that also specialize in psychiatry.

The data was requested to be sent in a PDF format and I sincerely apologize in advance for sending the data in excel format; the PDF writer cut off several lines of the report. For drugs such as Roxicodone and Xanax, there may not be ten prescribers listed since the AHCCCS pharmacy benefit requires the generic product be used if available; the brand name product is provided on an exception basis when a generic is available.

I would also like to notate that one of the top ten prescribers of narcotics included in the 2008 and 2009 attached reports, Angelo Chirban, M.D., has been terminated as a provider for AHCCCS and AHCCCS Contractors by David Botsko our Inspector General.

If I can be of any further assistance or if you need additional information, please contact me at your convenience.

<<Senator Grassley Data Request.5 5 2010.xls>>

Sincerely,

Suzi



Suzanne Berman, BS, RPh  
Director of Pharmacy Services  
AHCCCS  
701 E. Jefferson, MD8000  
Phoenix, AZ 85034  
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**ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM TOP TEN  
PRESCRIBER DATA FOR 2008**

Drug	Prescriber NPI	Number of Prescriptions	Total Amount Paid in 2008
Alprazolam	1265550511	622	\$ 9,062.41
Alprazolam	1013955624	556	\$ 8,514.41
Alprazolam	1801824875	506	\$ 2,231.96
Alprazolam	1982636585	443	\$ 3,830.07
Alprazolam	1225133598	387	\$ 6,172.47
Alprazolam	1649272030	384	\$ 4,728.32
Alprazolam	1689617938	371	\$ 1,174.62
Alprazolam	1881786150	367	\$ 2,912.11
Alprazolam	1124020284	321	\$ 3,712.38
Alprazolam	1184746364	297	\$ 2,307.39

Oxycodone	1306838123	2194	\$ 208,523.96
Oxycodone	1245219336	1058	\$ 35,402.66
Oxycodone	1255304184	835	\$ 53,687.18
Oxycodone	1124227111	724	\$ 47,143.90
Oxycodone	1962433417	696	\$ 65,854.17
Oxycodone	1750387783	606	\$ 58,875.89
Oxycodone	1033177043	587	\$ 18,381.07
Oxycodone	1740354265	557	\$ 36,910.62
Oxycodone	1265550511	461	\$ 8,990.10
Oxycodone	1578651071	437	\$ 24,924.88

Oxycodone-IR,ER & SR	1306838123	87	\$ 32,769.83
Oxycodone-IR,ER & SR	1740354265	44	\$ 10,716.13
Oxycodone-IR,ER & SR	1194739300	43	\$ 14,902.70
Oxycodone-IR,ER & SR	1063487486	31	\$ 403.10
Oxycodone-IR,ER & SR	1720044365	30	\$ 943.87
Oxycodone-IR,ER & SR	1124227111	28	\$ 10,129.88
Oxycodone-IR,ER & SR	1750387783	25	\$ 12,480.96
Oxycodone-IR,ER & SR	1851391353	22	\$ 8,655.13
Oxycodone-IR,ER & SR	1063437499	20	\$ 11,568.12
Oxycodone-IR,ER & SR	1972558047	15	\$ 12,410.40

**ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM TOP TEN  
PRESCRIBER DATA FOR 2008**

Oxycontin	1306838123	445	\$	206,244.42
Oxycontin	1255304184	144	\$	60,645.37
Oxycontin	1215105465	125	\$	68,673.67
Oxycontin	1740354265	80	\$	31,257.33
Oxycontin	1750387783	77	\$	40,901.62
Oxycontin	1902983380	58	\$	62,254.77
Oxycontin	1831203934	53	\$	2,721.88
Oxycontin	1174593693	50	\$	13,747.57
Oxycontin	1124014238	34	\$	6,660.96
Oxycontin	1669662151	31	\$	20,783.72

Roxicodone	1306838123	9	\$	1,918.86
Roxicodone	1669455978	3	\$	2,119.98
Roxicodone	1871666578	3	\$	186.59
Roxicodone	1144314758	1	\$	66.92
Roxicodone	1124227111	1	\$	47.11
Roxicodone	1932207297	1	\$	33.25
Roxicodone	1699734434	1	\$	4.91
Roxicodone	1689629719	1	\$	236.63
Roxicodone	1396851994	1	\$	13.15

Xanax	1598791170	9	\$	1,106.84
Xanax	1467545335	2	\$	221.67
Xanax	1306950407	1	\$	70.06
Xanax	1376600171	1	\$	2.47
Xanax	1326181819	1	\$	72.19

ABILIFY	1215993902	1,540	\$	603,506.31
ABILIFY	1700841194	1,375	\$	534,123.81
ABILIFY	1710097225	955	\$	331,123.88
ABILIFY	1801824875	709	\$	230,988.21
ABILIFY	1821054503	692	\$	273,186.62
ABILIFY	1376587816	643	\$	224,188.10
ABILIFY	1467418145	618	\$	224,097.21

**ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM TOP TEN  
PRESCRIBER DATA FOR 2008**

ABILIFY	1043210198	597	\$	197,960.82
ABILIFY	1417032178	546	\$	196,151.79
ABILIFY	1457461956	503	\$	192,787.83

GEODON	1801824875	523	\$	108,372.33
GEODON	1710017355	298	\$	97,568.90
GEODON	1154388650	280	\$	72,852.43
GEODON	1679659916	270	\$	93,354.17
GEODON	1700963295	267	\$	63,985.52
GEODON	1053491878	255	\$	79,008.60
GEODON	1174677769	226	\$	35,775.76
GEODON	1295741791	212	\$	29,912.72
GEODON	1356333207	209	\$	40,551.51
GEODON	1215993902	201	\$	40,341.63

SEROQUEL	1326078015	816	\$	161,505.32
SEROQUEL	1275503559	741	\$	201,136.50
SEROQUEL	1679659916	709	\$	179,697.00
SEROQUEL	1710017355	682	\$	196,640.82
SEROQUEL	1972536332	646	\$	98,032.47
SEROQUEL	1053491878	632	\$	128,269.40
SEROQUEL	1689617938	629	\$	121,257.39
SEROQUEL	1053499913	619	\$	135,978.00
SEROQUEL	1336226901	618	\$	117,479.95
SEROQUEL	1114037694	615	\$	103,842.26

ZYPREXA	1982636585	400	\$	185,609.71
ZYPREXA	1912932229	369	\$	178,717.16
ZYPREXA	1972536332	339	\$	94,655.89
ZYPREXA	1952398349	327	\$	98,340.50
ZYPREXA	1104854694	316	\$	87,978.31
ZYPREXA	1437236007	277	\$	69,183.60

**ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM TOP TEN  
PRESCRIBER DATA FOR 2008**

ZYPREXA	1336226901	265	\$	101,820.16
ZYPREXA	1801824875	260	\$	95,947.01
ZYPREXA	1689617938	252	\$	80,991.64
ZYPREXA	1700841194	242	\$	116,281.61

RISPERDAL	1679659916	719	\$	173,675.94
RISPERDAL	1700841194	718	\$	133,217.97
RISPERDAL	1710097225	704	\$	144,484.23
RISPERDAL	1801882972	611	\$	176,886.45
RISPERDAL	1467413369	569	\$	101,484.52
RISPERDAL	1700963295	513	\$	101,163.52
RISPERDAL	1154409324	507	\$	88,547.66
RISPERDAL	1912932229	487	\$	125,009.31
RISPERDAL	1194883629	451	\$	82,139.32
RISPERDAL	1831299502	429	\$	85,570.35

RISPERIDONE	1700841194	688	\$	80,157.98
RISPERIDONE	1710097225	602	\$	83,372.74
RISPERIDONE	1700963295	476	\$	62,537.94
RISPERIDONE	1639169154	398	\$	62,373.90
RISPERIDONE	1043210198	394	\$	50,830.44
RISPERIDONE	1912932229	381	\$	84,178.43
RISPERIDONE	1235220138	362	\$	57,402.20
RISPERIDONE	1831299502	361	\$	63,256.56
RISPERIDONE	1477533610	356	\$	43,568.29
RISPERIDONE	1467413369	355	\$	41,319.08

**ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM TOP TEN  
PRESCRIBER DATA FOR 2009**

Drug	Prescriber NPI	Number of Prescriptions	Total Amount Paid in 2009
Alprazolam	1265550511	773	\$ 8,218.75
Alprazolam	1801824875	660	\$ 2,998.24
Alprazolam	1710017355	647	\$ 3,536.77
Alprazolam	1225133598	571	\$ 8,550.14
Alprazolam	1972536332	505	\$ 2,376.79
Alprazolam	1053491878	487	\$ 2,075.03
Alprazolam	1982636585	464	\$ 5,400.13
Alprazolam	1689617938	463	\$ 1,479.02
Alprazolam	1649272030	461	\$ 8,675.32
Alprazolam	1821159112	454	\$ 8,773.53
Oxycodone HCl	1306838123	1429	\$ 122,654.13
Oxycodone HCl	1124227111	1133	\$ 64,269.32
Oxycodone HCl	1245219336	763	\$ 25,337.81
Oxycodone HCl	1720162522	689	\$ 3,950.86
Oxycodone HCl	1033177043	587	\$ 18,381.07
Oxycodone HCl	1265550511	529	\$ 8,582.82
Oxycodone HCl	1639195365	481	\$ 7,810.18
Oxycodone HCl	1306838123	459	\$ 39,042.16
Oxycodone HCl	1255304184	437	\$ 24,938.99
Oxycodone HCl	1578651071	437	\$ 24,924.88

Oxycodone-IR, ER &SR	1306838123	513	\$ 43,048.75
Oxycodone-IR, ER &SR	1184790362	348	\$ 32,112.90
Oxycodone-IR, ER &SR	1356596969	335	\$ 13,113.28
Oxycodone-IR, ER &SR	1740354265	327	\$ 24,098.32
Oxycodone-IR, ER &SR	1902983380	254	\$ 42,744.63
Oxycodone-IR, ER &SR	1851391353	243	\$ 17,677.71
Oxycodone-IR, ER &SR	1578651071	230	\$ 14,342.72
Oxycodone-IR, ER &SR	1437133428	192	\$ 13,234.48
Oxycodone-IR, ER &SR	1457422875	151	\$ 12,862.04
Oxycodone-IR, ER &SR	1891766838	134	\$ 15,086.06



**ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM TOP TEN  
PRESCRIBER DATA FOR 2009**

Drug	Prescriber NPI	Number of Prescriptions	Total Amount Paid in 2009
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Oxycontin	1306838123	365	\$ 209,165.34
Oxycontin	1528207255	198	\$ 108,476.12
Oxycontin	1740354265	119	\$ 60,737.04
Oxycontin	1306838123	110	\$ 52,701.32
Oxycontin	1215105465	105	\$ 54,474.57
Oxycontin	1902983380	104	\$ 117,095.83
Oxycontin	1306838123	101	\$ 60,839.30
Oxycontin	1255304184	99	\$ 68,512.36
Oxycontin	1528008620	96	\$ 108,741.88
Oxycontin	1528207255	95	\$ 52,735.19

Roxicodone	1215105465	13	\$ 2,588.09
Roxicodone	1316961436	8	\$ 56.91
Roxicodone	1528207255	6	\$ 975.32
Roxicodone	1184790362	4	\$ 1,059.97
Roxicodone	1255304184	4	\$ 741.99
Roxicodone	1629016514	3	\$ 844.77
Roxicodone	1043250756	3	\$ 1,240.80
Roxicodone	1851391353	3	\$ 735.65
Roxicodone	1689628513	3	\$ 546.17
Roxicodone	1720171143	3	\$ 625.77
Roxicodone	1083696546	3	\$ 223.99

Xanax	1881641272	21	\$ 1,629.83
Xanax	1770574857	13	\$ 951.06
Xanax	1629065925	12	\$ 1,309.01
Xanax	1689611162	10	\$ 549.02
Xanax	1336109453	7	\$ 757.96
Xanax	1215031216	6	\$ 370.26
Xanax	1245233147	5	\$ 936.60
Xanax	1336109453	5	\$ 384.64

**ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM TOP TEN  
PRESCRIBER DATA FOR 2009**

Drug	Prescriber NPI	Number of Prescriptions	Total Amount Paid in 2009
Xanax	1033133152	5	\$ 221.50
Xanax	1649225566	4	\$ 226.33

ABILIFY	1215993902	1,531	\$ 663,017.55
ABILIFY	1710097225	1,248	\$ 474,617.58
ABILIFY	1700841194	1,172	\$ 471,557.96
ABILIFY	1053491878	946	\$ 370,762.16
ABILIFY	1801824875	909	\$ 325,500.27
ABILIFY	1689617938	773	\$ 269,249.69
ABILIFY	1417032178	743	\$ 280,251.18
ABILIFY	1023194289	654	\$ 236,797.74
ABILIFY	1467418145	632	\$ 240,834.37
ABILIFY	1043210198	629	\$ 225,857.77

GEODON	1801824875	562	\$ 122,656.60
GEODON	1154388650	500	\$ 148,622.18
GEODON	1801882972	416	\$ 67,825.38
GEODON	1215993902	293	\$ 68,618.34
GEODON	1710017355	284	\$ 95,469.10
GEODON	1891947818	283	\$ 65,247.46
GEODON	1972536332	272	\$ 66,572.93
GEODON	1053491878	253	\$ 83,198.32
GEODON	1356333207	248	\$ 57,016.23
GEODON	1710097225	236	\$ 53,318.07

SEROQUEL	1326078015	1,280	\$ 265,994.44
SEROQUEL	1689617938	934	\$ 204,046.13
SEROQUEL	1275503559	917	\$ 280,414.45
SEROQUEL	1972536332	864	\$ 232,235.29
SEROQUEL	1710017355	853	\$ 275,238.76
SEROQUEL	1366423238	847	\$ 174,867.94
SEROQUEL	1003983560	792	\$ 236,425.50

**ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM TOP TEN  
PRESCRIBER DATA FOR 2009**

Drug	Prescriber NPI	Number of Prescriptions	Total Amount Paid in 2009
SEROQUEL	1053491878	786	\$ 164,568.42
SEROQUEL	1679659916	723	\$ 177,842.10
SEROQUEL	1801882972	688	\$ 133,799.43

ZYPREXA	1689617938	457	\$ 179,265.83
ZYPREXA	1104854694	422	\$ 142,743.36
ZYPREXA	1912932229	404	\$ 215,614.76
ZYPREXA	1952398349	373	\$ 157,861.36
ZYPREXA	1801824875	337	\$ 147,734.68
ZYPREXA	1972536332	318	\$ 122,207.92
ZYPREXA	1447220207	291	\$ 107,829.54
ZYPREXA	1508881046	280	\$ 148,964.37
ZYPREXA	1144280009	270	\$ 90,827.47
ZYPREXA	1801882972	265	\$ 64,704.43

RISPERDAL	1801882972	375	\$ 117,565.26
RISPERDAL	1720158892	304	\$ 68,307.20
RISPERDAL	1659444909	290	\$ 119,805.01
RISPERDAL	1154409324	281	\$ 46,231.36
RISPERDAL	1912934209	263	\$ 87,522.61
RISPERDAL	1194883629	253	\$ 54,881.42
RISPERDAL	1669530333	251	\$ 46,115.56
RISPERDAL	1891807665	246	\$ 80,374.75
RISPERDAL	1891853321	236	\$ 56,964.34
RISPERDAL	1710046081	233	\$ 34,158.37

RISPERIDONE	1700841194	1,746	\$ 64,112.15
RISPERIDONE	1710097225	1,719	\$ 78,018.26
RISPERIDONE	1962458182	978	\$ 103,659.95
RISPERIDONE	1912932229	958	\$ 59,721.43
RISPERIDONE	1700963295	908	\$ 38,822.18

**ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM TOP TEN  
PRESCRIBER DATA FOR 2009**

<b>Drug</b>	<b>Prescriber NPI</b>	<b>Number of Prescriptions</b>	<b>Total Amount Paid in 2009</b>
RISPERIDONE	1467413369	858	\$ 45,876.45
RISPERIDONE	1003912692	848	\$ 42,140.53
RISPERIDONE	1639169154	842	\$ 28,854.88
RISPERIDONE	1801882972	831	\$ 21,565.81
RISPERIDONE	1821054503	819	\$ 48,757.71

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**United States Senate**

COMMITTEE ON THE JUDICIARY

WASHINGTON, DC 20510-6275

BRUCE A. COHEN, *Chief Counsel and Staff Director*  
KOLAN L. DAVIS, *Republican Chief Counsel and Staff Director*

January 23, 2012

**VIA ELECTRONIC TRANSMISSION**

Tom Betlach  
Director, AHCCCS  
801 E. Jefferson Street, MD 4100  
Phoenix, AZ 85034

Dear Director Betlach:

On May 5, 2010, you provided my office with data regarding the top ten prescribers of several pain management and mental health drugs in your state. These types of drugs have addictive properties, and the potential for fraud and abuse by prescribers and patients is extremely high. Mental health drugs continue to be prescribed at astounding rates and pain management clinics are turning into a hotbed for black market painkillers. When these drugs are prescribed to Medicaid patients, it is the American people who pay the price for over-prescription, abuse, and fraud.

After an extensive review of prescribing habits of the serial prescribers of pain and mental health drugs in Arizona, I have concerns about the oversight and enforcement of Medicaid abuse in your state. While I am sensitive to concerns about the potential for misinterpretation of the data you provided, the numbers themselves are quite shocking.

For example, the top three prescribers of Oxycodone in Arizona account for 4087 prescriptions—more than the remainder of the top ten list combined. Similarly, the top

prescriber for OxyContin (the same top prescriber as Oxycodone), prescribed nearly triple the amount as the second prescriber and fourteen times the number ten prescriber. These outliers are consistent with several of the antipsychotic drugs as well—with the top prescribers writing double or triple the number of prescriptions as the other prescribers on the list.

It is my intention to ensure that each of the states is adequately monitoring, investigating, and stopping fraud and over-prescription of these types of drugs. Therefore, please provide answers to the following questions:

1. What action, if any, has your agency taken with respect to the prescribers identified to the Committee?
2. If there has been no action taken with respect to these prescribers, please explain why not.
3. Please identify which of the providers identified to the Committee remain eligible to bill the Medicaid Program.
4. Please provide the 2010 and 2011 numbers for the top prescribers of these same drugs.
5. Has each of these prescribers been cross-checked for complaints or misconduct with the state medical board or the National Practitioner Data Bank? If not, do you plan to do so?
6. Have any of the prescribers identified to this Committee been referred to your state medical board?
7. Is there any system set up in your state to identify and monitor excessive prescription writing? If not, why not?
8. Have you received any training or guidance from the Centers for Medicare and Medicaid Studies to help identify potential issues with prescription drugs?
9. Does your state maintain a database of all prescribed controlled-substances? If so, what entities have access to it?
10. Does your state have any point-of-sale restrictions related to maximum units, prior authorization, therapeutic duplication, or early refill? If not, why not?
11. Were any of these top ten prescribers identified in the federal-mandated Drug Utilization Review or CMS-base retrospective reviews?
12. Does your state have any programs in place to educate providers about the prescription of antipsychotics to children and adolescents?



Thank you in advance for your cooperation and attention in this matter. When responding to this letter, please number your answers in accordance with my questions. I would appreciate a response by February 13, 2012. If you have any questions, please do not hesitate to contact Erika Smith of my staff at (202) 224-5225.

Sincerely,

A handwritten signature in blue ink that reads "Chuck Grassley". The signature is written in a cursive, flowing style.

Charles E. Grassley  
Ranking Member  
Committee on the Judiciary

**Janice K. Brewer, Governor**  
**Thomas J. Betlach, Director**

801 East Jefferson, Phoenix, AZ 85034  
PO Box 25520, Phoenix, AZ 85002  
Phone: 602-417-4000  
www.azahcccs.gov



*Our first care is your health care*  
ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM

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April 3, 2012

The Honorable Charles E. Grassley  
Ranking Member  
Committee on the Judiciary  
152 Dirksen Senate Office Building  
Washington, DC 20510-6275

Dear Senator Grassley:

The AHCCCS Administration submits the following information in response to your January 23, 2012 correspondence regarding the prescription of pain management and mental health drugs in Arizona. Also provided are reports and a high level summary for the top ten prescribers in Arizona's Medicaid Program for years 2010 and 2011.

The Arizona Health Care Cost Containment System (AHCCCS) is Arizona's Medicaid program. Operating as a Section 1115 Research and Demonstration Program approved by the Centers for Medicare & Medicaid Services (CMS), AHCCCS has been recognized for its unique design, innovative strategies, and delivery of quality health care. The AHCCCS Program serves approximately 1.4 million low income members. The vast majority of health care services is provided through a managed care model using a system of capitated contracts across the State of Arizona. In addition, AHCCCS provides services to a small residual fee-for-service population consisting primarily of members who receive services through Indian Health Services and Tribal 638 facilities and members whose coverage is limited to emergency services. The AHCCCS Administration devotes substantial resources to program integrity initiatives with a continuing emphasis directed to preventing and detecting fraud and abuse.

Your January letter expresses concern about serial prescribers of pain and mental health drugs in Arizona and requests responses to twelve questions on the subject. Reflecting a concern stemming from AHCCCS 2008 data, your correspondence states that "the top three prescribers of Oxycodone in Arizona account for 4087 prescriptions - more than the remainder of the top ten list combined." You note that the top prescriber for Oxycodone is also the top prescriber for Oxycontin, writing nearly three times the number of prescriptions as the second prescriber and fourteen times the number ten prescriber.

The top prescriber for both medications, provider with NPI 1306838123, was terminated as a provider with the AHCCCS Program in 2010. AHCCCS participated in a joint multi agency task force to investigate this provider beginning in 2009, comprised of federal, state, and local law enforcement entities including the Office of the US Attorney, the federal Drug Enforcement Administration, the Arizona Office of the Attorney General, and the Internal Revenue Service. As a result, this individual was terminated from the AHCCCS Program, his medical license was revoked by the Arizona Board of Medical Examiners, he was indicted by a federal grand jury, and he is currently under prosecution by the Office of the US Attorney. AHCCCS anticipates

receiving restitution once the case is adjudicated. However, AHCCCS has received monies from this provider as a result of a civil monetary penalty action filed by the AHCCCS Office of Inspector General (OIG).

Regarding the 2008 prescriber data referenced in your January 2012 letter, a total of 8155 prescriptions were written for Oxycodone in 2008. Of these 8155 prescriptions, 4087 were written by the top three prescribers; Prescriber NPI 1306838123 accounted for 53.6% of the 4087 Oxycodone prescriptions (2194 Rxs) associated with the top three prescribers. 4068 prescriptions were written by the bottom seven prescribers. The 4068 prescriptions written by the bottom seven prescribers are 19 prescriptions fewer than the 4087 referenced above, equating to a 0.46% variance between the two prescription counts. As you might expect, by excluding the terminated prescriber's Oxycodone utilization, the number of prescriptions written by the bottom seven prescribers of the top ten far exceeds those written by the top two prescribers.

In reference to Oxycontin, 1097 prescriptions were written in 2008 by the top ten prescribers. Prescriber NPI 1306838123 accounted for 40.6% (455 Rxs) of the 1097 total Oxycontin prescriptions. Excluding this terminated physician's Oxycontin utilization, the average number of prescriptions written for Oxycontin by the remaining nine prescribers was 72. All of the prescribers were approximately 1 standard deviation from the mean, a figure which is not indicative of aberrant prescribing practices.

For years 2010 and 2011, please refer to the data in the spreadsheets. The total number of prescriptions filled for AHCCCS members was approximately 14.1M in 2010 and 13M in 2011. Average monthly enrollment in the behavioral health care system averaged approximately 122,000 for both 2010 and 2011. Of the 122,000 monthly behavioral health enrollees, 20% are adults diagnosed with serious mental illness, 32.5% are children/adolescents, and the remainder are enrolled in general mental health and/or substance abuse programs. All top ten prescribers of the atypical antipsychotic drugs listed in the 2010 and 2011 reports are psychiatric clinicians: adult and child psychiatrists as well as nurse practitioners and physician assistants who specialize in psychiatry.

AHCCCS data for years 2010 and 2011 reflect the following:

- The atypical antipsychotic utilization for the top ten prescribers was 34,236 prescriptions for 2010 and 33,474 in 2011. Of the total number of annual covered prescriptions paid for by the AHCCCS Program, the atypical antipsychotic prescriptions in the attached reports represent 0.24% and 0.26%, respectively.
- Of the approximate \$650M annual pharmacy expenditures, the atypical antipsychotic utilization equates to 1.45% and 1.66% of the annual expenditures for the years 2010 and 2011, respectively.
- The number of Oxycontin prescriptions totaled 882 in 2010 and 1025 in 2011, representing 0.006% and 0.008%, respectively, of the annual AHCCCS prescriptions.

When reviewing the 2010 and 2011 reports, please note that ten prescribers may not be listed for certain drugs, such as Roxicodone and Xanax. The AHCCCS pharmacy benefit requires use of a generic product when available and medically appropriate; therefore, less than ten prescribers associated with such medications may be identified.

Below are AHCCCS' responses to the twelve questions from your January 2012 letter.

**1. What action, if any, has your agency taken with respect to the prescribers identified to the Committee?**

*As previously reported in the email to Mr. Brian Downey on May 5 2010, and as mentioned above, one prescriber (Physician with NPI 1306838123) was investigated and terminated from the AHCCCS Program. This provider has been identified as the top prescriber in the AHCCCS Program for both Oxycodone and Oxycontin in 2008. AHCCCS participated in a joint multi agency task force to investigate this individual beginning in 2009. AHCCCS also filed a civil monetary penalty action against this provider, and financial penalties were successfully imposed. As a result of the multi agency investigation, this provider was indicted, and his medical license was revoked. This individual is currently under prosecution by the federal government.*

*In addition, the providers with the following NPIs have been terminated from the AHCCCS Program. These providers are not authorized to provide services or to be reimbursed for services through the AHCCCS Program:*

- 1881786150
- 1962433417
- 1932297297
- 1689629719
- 1457422875
- 1891766838

**2. If there has been no action taken with respect to these prescribers, please explain why not.**

*Please see the response to the previous question.*

**3. Please identify which of the providers identified to the Committee remain eligible to bill the Medicaid Program.**

*All of the providers in the 2008/2009 report remain eligible to provide and bill for services with the exception of those listed in question 1.*

**4. Please provide the 2010 and 2011 numbers for the top prescribers of these same drugs.**  
*The Top Ten Prescriber Reports for 2010 and 2011 are attached.*

**5. Has each of these prescribers been crosschecked for complaints or misconduct with the state medical board or the National Practitioner Data Bank? If not, do you plan to do so?**

*Yes, each prescriber has been crosschecked with their respective licensure board and the National Practitioner Data Bank.*

**6. Have any of the prescribers identified to this Committee been referred to your state medical board?**

*Yes, some prescribers have been referred to their respective state licensing boards for a variety of reasons.*

**7. Is there any system set up in your state to identify and monitor excessive prescription writing? If not, why not?**

*AHCCCS engages in numerous activities to identify and monitor excessive utilization of Medicaid services, including prescription medication. In addition to its ongoing internal fraud detection and prevention operations, AHCCCS OIG also participates on the prescription drug task force with HHS/OIG, the Drug Enforcement Administration (DEA), and the Office of the Arizona Attorney General. The OIG has access to and utilizes the Arizona State Board of Pharmacy's Prescription Drug Database and the Controlled Substance Prescription Monitoring Program to evaluate excessive use.*

*AHCCCS OIG utilizes a data-mining tool, EDIWatch, which identifies potential fraud and abuse by evaluating provider aberrant billing practices and excessive utilization of services by AHCCCS recipients.*

*Some examples of possible fraudulent billing practices include:*

- Billing for services or items that were never provided*
- Billing separate claims for services that should be billed together as a single item*
- Billing for services or equipment that are more expensive than what was supplied*
- Continuing to bill for home medical equipment after it has been returned*
- Scheduling unnecessary office visits or ordering unnecessary x-ray, laboratory or other services*
- Taking payment from another provider in exchange for referring a patient*
- Allowing an unlicensed person to perform treatment and billing as if a qualified individual had performed the service*

*Some examples of possible fraudulent recipient activities include:*

- Loaning a medical insurance card to another person*
- Using someone else's medical insurance card*
- Forging or altering a prescription*
- Doctor shopping in order to obtain multiple prescriptions*
- Using multiple Medicaid Identification cards*
- Intentionally receiving unneeded services or supplies*
- Accepting cash or other bribes for receiving services*
- Reselling items paid for by medical insurance payers*

- *Deliberately giving incorrect information to receive benefits*

**8. Have you received any training or guidance from the Centers for Medicare and Medicaid Studies to help identify potential issues with prescription drugs?**

*Yes, the AHCCCS OIG has received training from the Medicaid Integrity Institute, and it is scheduled for additional training in May 2012.*

**9. Does your state maintain a database of all prescribed controlled substances? If so, what entities have access to it?**

*Yes. Arizona Revised Statutes §36-2601 et seq. set forth Arizona's Controlled Substance Prescription Monitoring Program (CSPMP) which mandates the Arizona State Board of Pharmacy maintain a database of all controlled substances prescriptions dispensed in or into the State. AHCCCS is authorized by statute to obtain this information.*

*All pharmacies are required to report the dispensed controlled substances prescriptions to the Arizona State Board of Pharmacy. The Arizona State Board of Pharmacy maintains this database and may release data collected by the program to AHCCCS, providers, professional licensing boards, local, state, and federal law enforcement or criminal justice agencies, and pursuant to court order.*

**10. Does your state have any point-of-sale restrictions related to maximum units, prior authorization, therapeutic duplication, or early refill? If not, why not?**

*All point-of-sale (POS) pharmaceutical services are monitored through the use of electronic edits. Pharmacy benefit managers (PBMs) message the pharmacy at the point-of-sale in the form of an alert for these safety concerns. These alerts and concerns include, but are not limited to:*

- *Drug-allergy interactions*
- *Drug-drug interactions*
- *Drug-food interactions*
- *Drug-disease interactions*
- *High and suboptimal dose alerts*
- *Dosages above the FDA allowed maximum*
- *Therapeutic duplication*
- *Early refill requests*
- *Drug-age and gender alerts*

*Many prescriptions require prior authorization approval prior to dispensing the drug to the member. Prior authorization is used, in part, to ensure that the drug ordered by the prescriber meets medical necessity criteria and is clinically appropriate for the patient.*



*Effective July 1, 2012, AHCCCS will implement a Medication List that will specify uniform quantity limits for certain controlled substances. Prior authorization, to ensure that the medication is clinically appropriate and medically necessary, will be required for prescriptions written for greater than:*

- One short-acting narcotic and quantities in excess of 180 tablets in a 30-day time period*
- One long-acting narcotic and quantities in excess of those listed on the formulary*
- One anxiolytic and quantities in excess of 120*
- One hypnotic and quantities in excess of a 30-day supply*

*AHCCCS and its contractors also have in place "lock-in programs" for members who are identified as high utilizers of Medicaid services. Criteria for "high utilization" includes, but is not limited to, obtaining and receiving excessive prescription medications. Members who are placed in "lock-in programs" are formally notified that they may only obtain prescriptions through a single pharmacy or prescriber, or both.*

**11. Were any of these top ten prescribers identified in the federal-mandated Drug Utilization Review or CMS-base retrospective reviews?**

*No*

**12. Does your state have any programs in place to educate providers about the prescription of antipsychotics to children and adolescents?**

*Yes. This information is provided below:*

- The AHCCCS Contractor for acute behavioral health services, the Arizona Department of Health Services, Division of Behavioral Health Services (ADHS/DBHS), has established medication guidelines for children birth to five as well as adopted The American Academy of Child and Adolescent Psychiatry (AACAP) practice parameters, which includes atypical antipsychotic medications and prescribing psychotropic medication to children. These practice guidelines are distributed to behavioral health medical professionals in the public behavioral health system and are available upon request.*
- Behavioral health staffs are required to attend a state-developed training on the unique behavioral health needs of children in foster care, which includes information on the use of psychotropic medications.*
- For children who may need medication as part of their treatment plan, ADHS/DBHS has policy requirements regarding informed consent for psychotropic medications, including the essential elements that this process must include.*
- Entities that contract with ADHS/DBHS to provide behavioral health services, Tribal and Regional Behavioral Health Authorities (T/RBHAs), implement programming depending on the specific needs of their region. Examples of such programming include:*
  - Access to online resources and comprehensive databases which provide information on new developments in drug therapy and evidence-based answers on thousands of natural medicines and alternative therapies; and*

Senator Charles E. Grassley


04/03/2012

Page 7

- *Utilizing clinical pharmacists to meet with behavioral health providers to discuss evidence based medicine and any outlier prescribing activities.*

AHCCCS recognizes that prescription medication abuse is a national issue of concern, and we appreciate the opportunity to provide information regarding prescription medications in Arizona's Medicaid program. AHCCCS is committed to building upon its many successes with program integrity efforts, including initiatives to combat abusive prescription practices and strengthening fraud prevention and detection activities. In the event that you have any additional questions or concerns, please do not hesitate to contact me at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Betlach', with a stylized, flowing script.

Thomas J. Betlach  
Director

Attachment

# SENATOR GRASSLEY TOP TEN PRESCRIBER REPORT- ARIZONA 2010

Calendar Year 2010

Medication	Number of Prescriptions	Total Amount Paid in 2010	Prescriber NPI
ABILIFY	1305	\$ 644,900.12	1215993902
ABILIFY	1130	\$ 487,967.22	1700841194
ABILIFY	950	\$ 416,395.64	1710097225
ABILIFY	904	\$ 395,595.20	1801824875
ABILIFY	811	\$ 340,632.69	1417032178
ABILIFY	674	\$ 278,038.20	1275571739
			1639148950
ABILIFY	643	\$ 262,048.05	1922112044
ABILIFY	642	\$ 255,542.73	1639169154
ABILIFY	640	\$ 301,785.07	1487989166
ABILIFY	634	\$ 279,487.62	1023194289

ALPRAZOLAM	2533	\$ 17,972.73	1013955624
ALPRAZOLAM	1483	\$ 22,318.73	1851557300
ALPRAZOLAM	1130	\$ 9,800.01	1710017355
ALPRAZOLAM	871	\$ 5,617.64	1801824875
ALPRAZOLAM	857	\$ 3,129.51	1437123775
ALPRAZOLAM	751	\$ 12,077.56	1225133598
ALPRAZOLAM	669	\$ 2,949.99	1972536332
ALPRAZOLAM	664	\$ 5,520.29	1487989166
ALPRAZOLAM	641	\$ 7,385.21	1982636585
ALPRAZOLAM	626	\$ 9,329.70	1265550511

GEODON	669	\$ 183,151.44	1700841194
GEODON	477	\$ 146,905.00	1801824875
GEODON	431	\$ 154,327.57	1154388650
GEODON	336	\$ 77,171.59	1710097225
GEODON	307	\$ 69,207.51	1801882972
GEODON	304	\$ 86,013.93	1215993902
GEODON	275	\$ 95,837.68	1710017355
GEODON	242	\$ 81,479.17	1972536332
GEODON	232	\$ 89,015.24	1275503559
GEODON	212	\$ 63,175.47	1275758971

OXYCODONE	3956	\$ 49,101.04	1013955624
OXYCODONE	2663	\$ 142,012.68	1851557300
OXYCODONE	2215	\$ 161,325.49	1437123775
OXYCODONE	1950	\$ 130,948.76	1881669679
OXYCODONE	1885	\$ 41,787.12	1033177043

# SENATOR GRASSLEY TOP TEN PRESCRIBER REPORT- ARIZONA 2010

Medication	Number of Prescriptions	Total Amount Paid in 2010	Prescriber NPI
OXYCODONE	1612	\$ 99,243.13	1740270750
OXYCODONE	1606	\$ 107,306.86	1932291408
OXYCODONE	1597	\$ 19,392.85	1154384899
OXYCODONE	1574	\$ 84,018.16	1245254127
OXYCODONE	1343	\$ 58,386.88	1730145053

OXYCONTIN	195	\$ 64,514.32	1346235355
OXYCONTIN	159	\$ 61,270.79	1881669679
OXYCONTIN	101	\$ 65,570.23	1851391353
OXYCONTIN	72	\$ 39,480.77	1740270750
OXYCONTIN	68	\$ 82,726.59	1568677706
OXYCONTIN	65	\$ 33,222.20	1639120520
OXYCONTIN	60	\$ 74,360.48	1528008620
OXYCONTIN	60	\$ 34,147.09	1437133428
OXYCONTIN	56	\$ 41,547.81	1780686261
OXYCONTIN	46	\$ 15,224.50	1679536676

RISPERDAL	218	\$ 84,696.06	1568674638
RISPERDAL	208	\$ 89,301.89	1568599611
RISPERDAL	196	\$ 68,616.61	1154409324
RISPERDAL	192	\$ 65,918.50	1235332883
RISPERDAL	166	\$ 73,347.01	1639239015
RISPERDAL	160	\$ 49,195.19	1790863975
RISPERDAL	158	\$ 63,444.95	1780795302
RISPERDAL	156	\$ 46,186.13	1720158892
RISPERDAL	146	\$ 57,730.85	1295814366
RISPERDAL	134	\$ 46,823.83	1861582025

RISPERIDONE	1670	\$ 49,470.88	1710097225
RISPERIDONE	1398	\$ 44,815.68	1700841194
RISPERIDONE	1002	\$ 49,554.64	1821054503
			1003912692
RISPERIDONE	900	\$ 30,267.10	1588973945
RISPERIDONE	889	\$ 26,442.61	1275571739
RISPERIDONE	855	\$ 27,454.70	1295770063
RISPERIDONE	827	\$ 19,972.10	1639169154
RISPERIDONE	812	\$ 69,581.38	1962458182
RISPERIDONE	785	\$ 19,004.74	1043210198
RISPERIDONE	754	\$ 28,378.26	1831299502

# SENATOR GRASSLEY TOP TEN PRESCRIBER REPORT- ARIZONA 2010

Medication	Number of Prescriptions	Total Amount Paid in 2010	Prescriber NPI
ROXICODONE	6	\$ 751.40	1396748851
ROXICODONE	2	\$ 32.26	1881814390
ROXICODONE	1	\$ 75.38	1215105465
ROXICODONE	1	\$ 38.64	1861498487
ROXICODONE	1	\$ 149.55	1376542118
ROXICODONE	1	\$ 131.65	1154384899
ROXICODONE	1	\$ 89.70	1649380049

SEROQUEL	923	\$ 242,490.61	1326078015
SEROQUEL	915	\$ 393,335.63	1275503559
SEROQUEL	872	\$ 238,051.80	1053491878
SEROQUEL	858	\$ 332,880.73	1710017355
SEROQUEL	819	\$ 190,755.16	1760417489
SEROQUEL	758	\$ 209,765.57	1114037694
SEROQUEL	757	\$ 201,888.58	1689617938
SEROQUEL	731	\$ 135,643.85	1366423238
SEROQUEL	697	\$ 216,592.00	1972536332
SEROQUEL	610	\$ 152,217.65	1265654206

XANAX	9	\$ 1,796.16	1780772574
XANAX	8	\$ 1,182.82	1063466647
XANAX	7	\$ 310.10	1033133152
XANAX	6	\$ 238.59	1881641272
XANAX	4	\$ 228.52	1518053503
XANAX	3	\$ 17.79	1487762456
XANAX	2	\$ 5.30	1992969596
XANAX	1	\$ 25.85	1598786865
XANAX	1	\$ 3.05	1710151378
XANAX	1	\$ 2.28	1063437499

ZYPREXA	480	\$ 204,735.88	1689617938
ZYPREXA	336	\$ 189,123.85	1801824875
ZYPREXA	312	\$ 163,791.14	1275780009
ZYPREXA	275	\$ 145,392.24	1710017355
ZYPREXA	272	\$ 113,756.97	1144280009
ZYPREXA	242	\$ 123,934.00	1194749341
ZYPREXA	237	\$ 137,896.57	1972536332
ZYPREXA	233	\$ 133,639.21	1275503559
ZYPREXA	233	\$ 98,486.67	1356317077
ZYPREXA	232	\$ 72,387.22	1801882972



# SENATOR GRASSLEY TOP TEN PRESCRIBER REPORT - ARIZONA 2011

Calendar Year 2011

Medication	Number of Prescriptions	Total Amount Paid in 2011	Prescriber NPI
ABILIFY	1390	\$ 658,715.11	1700841194
ABILIFY	1064	\$ 557,642.72	1215993902
ABILIFY	909	\$ 421,804.63	1417032178
ABILIFY	870	\$ 407,564.34	1710097225
ABILIFY	840	\$ 447,902.51	1801824875
ABILIFY	720	\$ 370,738.85	1518940832
ABILIFY	677	\$ 340,087.91	1821054503
ABILIFY	658	\$ 336,419.34	1023194289
ABILIFY	657	\$ 338,549.19	1275758971
ABILIFY	623	\$ 298,042.95	1639148950 1922112044

ALPRAZOLAM	1330	\$ 13,777.70	1851557300
ALPRAZOLAM	1146	\$ 6,843.87	1013955624
ALPRAZOLAM	902	\$ 14,919.52	1376610832
ALPRAZOLAM	898	\$ 13,934.58	1588662852 1922006204
ALPRAZOLAM	761	\$ 7,242.08	1710017355
ALPRAZOLAM	742	\$ 8,467.16	1245254127
ALPRAZOLAM	683	\$ 9,183.41	1730145053
ALPRAZOLAM	683	\$ 1,989.93	1437123775
ALPRAZOLAM	621	\$ 3,559.83	1801824875
ALPRAZOLAM	599	\$ 16,837.74	1124020284

GEODON	459	\$ 173,024.76	1801824875
GEODON	440	\$ 119,377.60	1215993902
GEODON	349	\$ 150,558.07	1275503559
GEODON	314	\$ 108,018.13	1700841194
GEODON	287	\$ 130,434.81	1154388650
GEODON	280	\$ 72,322.32	1710097225
GEODON	248	\$ 73,505.76	1518940832
GEODON	235	\$ 81,606.85	1275758971
GEODON	228	\$ 75,259.74	1639148950 1922112044
GEODON	223	\$ 69,917.72	1316928708

OXYCODONE	2828	\$ 173,306.53	1508898602
OXYCODONE	2670	\$ 170,846.46	1437123775
OXYCODONE	2415	\$ 46,240.78	1033177043



# SENATOR GRASSLEY TOP TEN PRESCRIBER REPORT - ARIZONA 2011

Medication	Number of Prescriptions	Total Amount Paid in 2011	Prescriber NPI
OXYCODONE	2380	\$ 140,314.95	1881669679
OXYCODONE	2203	\$ 114,786.06	1932291408
OXYCODONE	2056	\$ 19,165.40	1013955624
OXYCODONE	1929	\$ 80,155.76	1730145053
OXYCODONE	1766	\$ 80,653.59	1104082650 1851557300
OXYCODONE	1695	\$ 102,440.98	1720171143
OXYCODONE	1578	\$ 96,021.98	1679536676
OXYCONTIN	177	\$ 60,648.46	1346235355
OXYCONTIN	116	\$ 93,651.51	1851391353
OXYCONTIN	106	\$ 84,868.73	1336208123
OXYCONTIN	104	\$ 28,349.12	1508898602
OXYCONTIN	94	\$ 45,626.99	1548273055
OXYCONTIN	90	\$ 54,478.69	1215105465
OXYCONTIN	88	\$ 46,314.36	1306851977
OXYCONTIN	88	\$ 49,284.05	1871732727
OXYCONTIN	85	\$ 21,551.21	1881669679
OXYCONTIN	77	\$ 55,966.26	1255304184

RISPERDAL	368	\$ 137,048.52	1154409324
RISPERDAL	284	\$ 124,433.54	1679659916
RISPERDAL	281	\$ 104,534.66	1235332883
RISPERDAL	274	\$ 99,010.20	1518044874
RISPERDAL	258	\$ 80,583.89	1720158892
RISPERDAL	253	\$ 113,054.59	1568599611
RISPERDAL	235	\$ 107,329.09	1568674638
RISPERDAL	223	\$ 90,052.64	1982755492
RISPERDAL	211	\$ 76,539.21	1952353203
RISPERDAL	206	\$ 82,351.53	1538368717

RISPERIDONE	2153	\$ 90,338.97	1700841194
RISPERIDONE	1144	\$ 25,202.87	1003912692 1588973945
RISPERIDONE	1095	\$ 28,573.07	1710097225
RISPERIDONE	911	\$ 19,179.87	1043210198
RISPERIDONE	906	\$ 35,204.18	1417032178
RISPERIDONE	888	\$ 25,509.22	1295770063
RISPERIDONE	816	\$ 18,853.02	1275758971
RISPERIDONE	797	\$ 16,567.81	1477533610

# SENATOR GRASSLEY TOP TEN PRESCRIBER REPORT - ARIZONA 2011

Medication	Number of Prescriptions	Total Amount Paid in 2011	Prescriber NPI
RISPERIDONE	773	\$ 25,096.78	1821054503
RISPERIDONE	732	\$ 11,044.82	1114037694

ROXICODONE	10	\$ 1,569.70	1376542118
ROXICODONE	2	\$ 85.01	1740207448
ROXICODONE	2	\$ 22.50	1013992817
ROXICODONE	1	\$ 157.26	1548273055
ROXICODONE	1	\$ 47.90	1811957145
ROXICODONE	1	\$ 16.76	1285854844
ROXICODONE	1	\$ 57.05	1881814390
ROXICODONE	1	\$ 9.14	1609978147
ROXICODONE	1	\$ 20.76	1316961436
ROXICODONE	1	\$ 10.51	1205804283
ROXICODONE	1	\$ 156.97	1235264169

SEROQUEL	825	\$ 315,079.07	1114037694
SEROQUEL	731	\$ 229,724.85	1265764831
SEROQUEL	711	\$ 411,603.00	1275503559
SEROQUEL	698	\$ 256,635.55	1811975139
SEROQUEL	676	\$ 295,474.72	1710017355
SEROQUEL	622	\$ 279,075.11	1689617938
SEROQUEL	597	\$ 231,492.67	1326078015
SEROQUEL	593	\$ 342,648.44	1538498738
SEROQUEL	588	\$ 173,066.63	1760417489
SEROQUEL	575	\$ 223,621.89	1053491878

XANAX	10	\$ 1,370.94	1336186543
XANAX	6	\$ 175.06	1154381218
XANAX	5	\$ 1,515.25	1760694129
XANAX	5	\$ 1,036.75	1891783338
XANAX	4	\$ 1,211.46	1609946672
XANAX	2	\$ 60.00	1902009145
XANAX	1	\$ 57.13	1518053503
ZYPREXA	352	\$ 206,131.86	1689617938
ZYPREXA	241	\$ 172,761.19	1972536332
ZYPREXA	227	\$ 165,226.02	1801824875
ZYPREXA	203	\$ 105,982.64	1144280009
ZYPREXA	192	\$ 90,406.99	1801882972
ZYPREXA	190	\$ 126,533.68	1275780009
ZYPREXA	190	\$ 93,630.10	1275758971
ZYPREXA	188	\$ 151,594.48	1275503559

# SENATOR GRASSLEY TOP TEN PRESCRIBER REPORT - ARIZONA 2011

Medication	Number of Prescriptions	Total Amount Paid in 2011	Prescriber NPI
ZYPREXA	188	\$ 63,410.05	1366423238
ZYPREXA	188	\$ 118,420.41	1710017355

OLANZAPINE	68	\$ 26,589.06	1689617938
OLANZAPINE	58	\$ 21,383.54	1275758971
OLANZAPINE	54	\$ 24,095.75	1801824875
OLANZAPINE	44	\$ 22,815.76	1275503559
OLANZAPINE	40	\$ 26,022.25	1639239015
OLANZAPINE	36	\$ 22,446.94	1275780009
OLANZAPINE	32	\$ 20,736.13	1972536332
OLANZAPINE	31	\$ 17,240.67	1982755492
OLANZAPINE	29	\$ 15,346.30	1538498738
OLANZAPINE	28	\$ 8,566.50	1326078015